Chapter 5 Special Cases

There are unique situations where you will need to exercise your discretion as a financial aid administrator: when modifying data used to calculate the expected family contribution (EFC), performing dependency overrides, resolving conflicting information, reporting cases of fraud, and determining a student to be an unaccompanied homeless youth.

The following special cases are discussed in further detail in this chapter:

- You may choose to exercise professional judgment (PJ) to adjust a student's cost of attendance or the data that determine a student's EFC to account for a student's **special circumstance**.
- You might decide that **unusual circumstances** warrant making a dependent student an independent student.
- You may need to determine if a student should be classified as an unaccompanied homeless youth.
- · You may need to resolve a discrepancy after receiving conflicting information for a student.
- In some cases, you may discover that a student or employee has been guilty of **fraud** and should be reported to the Department.

Professional Judgment

The FAFSA Simplification Act (the Act) distinguishes between different categories of professional judgment by amending section 479A of the HEA.

- **Special Circumstances** refer to the financial situations (loss of a job, etc.) that justify an aid administrator adjusting data elements in the COA or in the EFC calculation.
- **Unusual Circumstances** refer to the conditions that justify an aid administrator making an adjustment to a student's dependency status based on a unique situation (e.g., human trafficking, refugee or asylee status, parental abuse or abandonment, incarceration), more commonly referred to as a dependency override.

A student may have both a special circumstance and an unusual circumstance. Financial aid administrators (FAAs) may make adjustments that are appropriate to each student's situation with appropriate documentation. See <u>GEN-22-15</u> for additional guidance and discussion of the changes made by the *FAFSA Simplification Act* and implemented for the 2023-24 Award Year.

Special Circumstances

An aid administrator may use PJ on a case-by-case basis to adjust the student's cost of attendance or the data used to calculate his or her EFC. This adjustment is valid only at the school making the change.

The law gives some examples of special circumstances that MAY be considered (HEA Sec. 479A):

- Change in employment status, income, or assets
- Change in housing status (e.g., homelessness)
- Tuition expenses at an elementary or secondary school
- Medical, dental, or nursing home expenses not covered by insurance
- Child or dependent care expenses
- Severe disability of the student or other member of the student's household
- Other changes or adjustments that impact the student's costs or ability to pay for college.

This is not an exhaustive list. You may use your discretion to make appropriate, reasonable adjustments to reflect a student's situation more accurately. As explained in Chapter 2, this may include accounting for resources, such as in-kind support, that do not appear on the FAFSA or in the EFC calculation. You may also use your discretion to deny a student's request for adjustment. However, you may not maintain a policy to deny all requests for special circumstance adjustments. This means that schools can no longer indicate that they do not perform PJs. Your institution must develop policies and a process for reviewing requests for professional judgment. Additionally, your institution must publicly

disclose that students may request an adjustment based on special circumstances. This could include (but is not limited to) posting what may be considered a special or unusual circumstance on your website, include such information in mailings to students, or add language on award notifications.

The reason for your decision to approve or deny a request for professional judgment and any subsequent adjustments **must be documented**. The documentation must relate to the special circumstances that differentiate the student—not to conditions that exist for a whole class of students. You must resolve any inconsistent or conflicting information before making any adjustments. An FAA's decision regarding adjustments is final and cannot be appealed to the Department.

The law *doesn't allow you to modify either the formula or the tables used in the EFC calculation;* you can only change the cost of attendance, or the values of specific data elements used in the EFC calculation. In addition, you cannot adjust data elements or the cost of attendance solely because you believe the tables and formula are not adequate or appropriate. The data elements that are adjusted must relate to the student's special circumstances. For example, if a family member is ill, you might modify the AGI to allow for lower earnings in the coming year or might adjust assets to indicate that family savings will be spent on medical expenses.

You also cannot use PJ to waive general student eligibility requirements or to circumvent the intent of the law or regulations. For instance, you cannot use PJ to change FSEOG selection criteria.

Occasionally aid administrators have made decisions contrary to the professional judgment provision's intent. These "unreasonable" judgments have included, for example, the reduction of EFCs based on recurring costs such as vacation expenses, tithing expenses, and standard living expenses (e.g. utilities, credit card expenses, children's allowances, etc.). Aid administrators must make "reasonable" decisions that support the intent of the provision. Your school is held accountable for all professional judgment decisions and for fully documenting each decision.

When considering using PJ, an FAA should keep in mind that an income protection allowance (IPA) is included in the EFC calculation to account for modest living expenses. Before adjusting for an unusual expense, consider whether it is already covered by the IPA. It is reasonable to assume that approximately 30% of the IPA is for food, 22% for housing, 9% for transportation expenses, 16% for clothing and personal care, 11% for medical care, and 12% for other family consumption. The income protection allowance is one of the intermediate values in the FAA Information section of the output document (labeled as "IPA"). See *Chapter 3* for the IPA values and how they impact the student's EFC calculation.

If you use professional judgment to adjust a data element, you must use the resulting EFC consistently for all FSA funds awarded to that student. For example, if for awarding the student's Pell Grant you adjust a data element that affects the EFC, that new EFC must also be used to determine the student's eligibility for aid from the Campus-Based and Direct Loan programs.

If you make a PJ adjustment, you must set the FAA Adjustment flag. You submit a PJ change electronically, via FAA Access to CPS Online or third-party software, and may do so without a signature from the student or parent. In FAA Access or Electronic Data Exchange (EDE), you must select "EFC adjustment requested" for the professional judgment field. The next ISIR will indicate "Professional judgment processed."

If you exercise PJ for a student who was selected for verification (by you or the Department), you must complete verification first. This is to ensure that you have correct information before considering a PJ adjustment. You may, however, complete verification and then make the PJ adjustment on the same transaction.

You do not have to verify information that you will entirely remove due to PJ. For example, if a dependent student's parents have separated after completion of the FAFSA form and one parent is no longer in the household size, you may decide to use PJ to remove that parent's income from the FAFSA form. You do not have to verify that parent's income prior to removing it. Also, using PJ does not require you to verify a student's application if he or she was not already selected for verification by the Department or your school.

Finally, a school is not permitted to make a professional judgement for a student after that student has ceased to be eligible, including when a student is no longer enrolled.

The <u>verification page on the FSA Assessments site</u> has guidance to help you review your PJ and dependency override procedures; see Activity 2.

PJ examples

Example 1: Kitty's mother had income earned from work of \$25,000 in 2021 but is no longer employed. After receiving documentation confirming this, the FAA at Krieger College decides to adjust the AGI reported for Kitty's parents to account for their reduced income. The FAA also reduces the income earned from work for Kitty's mother to zero.

Example 2: In 2021 Alan had \$4,500 in medical expenses that were out-of-pocket costs. He is married, has two children, and is the only member of his household in college, so his IPA is \$46,040. Because his expenses were less than the amount for medical expenses already provided for in the IPA (11% of \$46,040 is \$5,067), the aid administrator at Sarven Technical Institute does not adjust Alan's FAFSA form.

Professional Judgment During a Disaster, Emergency, or Economic Downturn

The FAFSA Simplification Act, enacted into law as part of the Consolidated Appropriations Act, 2021, and amended by the Consolidated Appropriations Act, 2022, codifies previous guidance from the Department (as issued in earlier Dear Colleague Letters) to use statutory authority to exercise professional judgment during a disaster, emergency, or economic downturn.

Financial aid administrators may, during a qualifying emergency:

- determine that the income earned from work for an applicant is zero, if the applicant can provide paper or electronic documentation of receipt of unemployment benefits or confirmation that an application for unemployment benefits was submitted; and
- make additional appropriate adjustments to the income earned from work for a student, parent, or spouse, as applicable, based on the totality of the family's situation, including consideration of unemployment benefits.

Acceptable documentation of unemployment should be submitted not more than 90 days from the date it was issued. However, institutions may use discretion to accept documentation older than 90 days under their general professional judgment authority if they do not have reason to believe there is conflicting information.

Further, the Department will adjust the program review selection model to account for an increase in the use of professional judgment by schools during the award years applicable to the qualifying emergency.

Refusing or reducing a loan

FAAs may also use their discretion to refuse or reduce Direct Loan funds if they document the reason, make the determination on a case-by-case basis, notify the student in writing, and ensure the decision is not due to discrimination on the basis of race, national origin, religion, sex, income, age, or disability.

Refusing or reducing a loan

34 CFR 685.301(a)(8)

Unusual Circumstances

The FAFSA Simplification Act provides a clearer directive for FAAs to assist applicants with unusual circumstances to adjust dependency status on the FAFSA form to reflect students' situations more accurately (dependency overrides). Like other types of professional judgments, institutions must make students aware of their ability to request an adjustment for

unusual circumstances by publicly posting the option on their website.

An FAA may conduct dependency overrides on a **case-by-case** basis for students with unusual circumstances. If the FAA determines that an override is appropriate, he or she must maintain the determination with any supporting documentation.

Dependency overrides

HEA Sec. 479A(c) and 480(d)(9)). Also see Dear Colleague Letter GEN-22-15.

Under HEA Sec. 480(d)(9), the *FAFSA Simplification Act* incorporated additional unusual circumstances to consider when a student is unable to contact a parent or where contact with parents poses a risk to such student.

Unusual circumstances do include:

- Human trafficking, as described in the Trafficking Victims Protection Act of 2000 (22 U.S.C. 7101 et seq.);
- · Legally granted refugee or asylum status;
- · Parental abandonment or estrangement; or
- Student or parental incarceration.

In such cases an override might be warranted based upon the student's individual circumstances. These conditions would also not disqualify a student from being a homeless unaccompanied youth or self-supporting and at risk of homelessness.

However, none of the conditions listed below, singly or in combination, qualify as unusual circumstances meriting a dependency override.

Unusual circumstances do not include:

- Parents refuse to contribute to the student's education.
- Parents will not provide information for the FAFSA or verification.
- Parents do not claim the student as a dependent for income tax purposes.
- Student demonstrates total self-sufficiency.

An aid administrator may override only from dependent to independent (though as suggested earlier, if an independent student receives substantial support from others, a school may use PJ to adjust the COA or FAFSA data items, such as untaxed income).

Additionally, the Act introduces new requirements for processing and communicating with students who request an adjustment for unusual circumstances. For aid applications for the 2023-24 Award Year and thereafter, schools and financial aid administrators must:

- Notify students of the school's process, requirements, and reasonable timeline to review adjustment requests after their FAFSA form is submitted;
- Provide students with a final determination of their dependency status and financial aid award as soon as practicable after reviewing all requested documentation;
- Retain all documentation, including documented interviews, related to the adjustment for at least 3 years after the student's last term of enrollment; and
- Presume that any student who has obtained an adjustment for unusual circumstances and a final determination of independence to be independent for each subsequent award year at the same institution unless--
 - The student informs the institution that their circumstances have changed; or
 - The institution has conflicting information about the student's independence.

Documentation is critical – schools must ensure that any supporting documentation they collect is adequate to substantiate the student's circumstances. Documentation may include (but is not limited to) the following:

- a documented interview between the student and the financial aid administrator;
- submission of a court order or official Federal or State documentation that the student or student's parents or legal guardians are incarcerated;
- a documented phone call or written statement, which confirms the unusual circumstances with:
 - a state, county or Tribal welfare agency;
 - an independent living case worker who supports current and former foster youth with the transition to adulthood;
 - o a public or private agency, facility, or program servicing the victims of abuse, neglect, assault, or violence; or
- a documented phone call or written statement from an attorney, guardian ad litem, a court-appointed special advocate (or similar), or a representative of a TRIO or GEAR UP program which confirms the circumstances and the person's relationship to the student;
- a documented determination of independence made by a financial aid administrator at another institution in the same or a prior award year; or
- utility bills, health insurance, or other documents that demonstrate a separation from parents or legal guardians.

Beginning with the 2023-2024 award year, FAAs may use a dependency override made in a prior award year at the same institution. In fact, the Department encourages you to use the flexibility in the law to presume a student with a dependency override is independent in subsequent years unless the student tells you their situation has changed, or you have conflicting information. Though institutions can ask students if their unusual circumstances or homeless situation has changed each year, they should not maintain a practice that delays or hinders financial aid for such a student, nor may they require the student to answer prior to packaging or disbursing aid or require the student to submit additional documentation unless there is conflicting information that the institution needs to resolve.

To override the student's dependent status on an initial application through FAA Access to CPS Online, the FAA should use the Dependency Override code of "1" (see the *EDE Technical Reference* for more information).

To authorize a dependency override on a paper FAFSA form, the FAA marks the bubble for an override, labeled "D/O," in the "College Use Only" area, fills in the school's federal code, and signs. A separate letter attached to the application in lieu of making the override is **not** acceptable.

Overrides on t	he paper F	AFSA
OLLEGE USE ONLY	·	EDERAL SCHOOL CODE
D/O 1 Hom- Youth Deter		
AA Signature		

If the student has already applied, you can use FAA Access to authorize or cancel an override; overrides cannot be done on the SAR. If he or she had an override done at another school in the current year, that will be noted with the school's federal code on FAA Access. Only the school performing the override will receive that transaction. If the student adds your school to the transaction or if he or she gives you his or her data release number (DRN), you can access the record.

Override examples

Example 1: Said is a refugee from Syria who qualifies for federal student aid as an eligible noncitizen. But his FAFSA form was rejected because he is a dependent student and did not provide data for his parents. When the aid administrator asks him for his parents' information, he says they are in Syria and have been displaced due to the upheaval there, and he doesn't know how to contact them. The FAA asks him for documentation of this and Said says that he has an uncle living in the U.S. who can attest to his situation. The FAA asks for Said's uncle to either appear in person and sign a statement confirming Said's account or to send the aid office a notarized statement. Said's uncle, who works not far from the school, comes to the aid office, signs the statement, and the

FAA grants Said a dependency override.

Example 2: Sam is a lesbian who came out to her parents when she was 14. Her relationship with them, which was not very good before, became so much worse that they told her she needed to move out. Sam reached out to her high school counselor for help, who asked her if she had some place to go. The parents of Sam's good friend Josie said that she could stay with them. Because they provided her fixed, regular, and adequate nighttime residence, she would not be considered a homeless youth.

Sam's relationship with her parents did not improve, and over the next several years she had almost no contact with them. When Sam filled out her FAFSA for the first time, she entered the names of Josie's parents without telling them or including their SSNs or birthdates. When the application was rejected, Sam spoke to an FAA at the college she planned to attend, who explained to her that she would need to include the information for her legal parents. Sam told the FAA about her situation, and the FAA asked her to provide documentation. Sam provided a statement regarding her situation and a letter from Josie's family. Her high school counselor also provided a statement with his knowledge of the situation. After reviewing the documentation provided, the FAA granted a dependency override.

Unable to provide parent data

Students can indicate in the online FAFSA that they believe they have unusual circumstances that prevent them from providing parental data. Those who indicate this are thoroughly informed about what warrants a dependency override and what the results will be for their application. If they persist through those screens and do not include parental data, they will get a rejected ISIR with the special circumstances flag set. You will have to review such a student's situation and determine if he or she:

- 1. is unaccompanied and homeless,
- 2. merits a dependency override,
- 3. must instead provide parental data, or
- 4. should be permitted to borrow only unsubsidized loans because he or she can document that his or her parents have refused to support him or her and to provide their information on his or her FAFSA.

Dependent students without parent support

Dependent students whose parents refuse to support them are not eligible for a dependency override, but they may be able to receive a dependent level Direct Unsubsidized Loan only. For a student to be eligible for this provision you must document the following:

- 1. the student's parents refuse to complete the FAFSA; or
- 2. the student's parents do not and will not provide any financial support to him or her (include the date support ended).

If the parents refuse to sign and date a statement to this effect, you must get documentation from a third party (the student is not sufficient), such as a teacher, counselor, cleric, or court.

This situation does not on its own justify a dependency override. However, resolving the situation is at your discretion. If you decide that a student falls into this category, you must document your decision and ensure that the student submits a FAFSA form and passes all the eligibility matches. The result will be a rejected application with no EFC. You can then award the student a Direct Unsubsidized Loan up to the maximum the student would normally be eligible for depending on his or her grade level (but not the amount a student can get when his or her parent is unable to get a Direct PLUS Loan).

Unaccompanied Homeless Youth

If a student does not have and cannot get documentation from any of the authorities listed under the "Unaccompanied homeless youth" section in Chapter 2, you (the FAA) must determine if he or she is an unaccompanied youth who is homeless or is self-supporting and at risk of being homeless. Any student who is not yet 24 may qualify for a homeless youth determination. It is important to make homeless youth determinations on a case-by-case basis.

Homeless youth determinations

A student is considered homeless if he or she lacks fixed, regular, and adequate housing. This is broader than just living "on the street." It includes but is not limited to:

- youth sharing housing with other people temporarily because they had nowhere else to go;
- youth living in emergency or transitional shelters, for example, trailers provided by the Federal Emergency Management Agency after disasters;
- youth living in motels, campgrounds, cars, parks, abandoned buildings, bus or train stations, substandard housing, or any public or private place not designed for humans to live in;
- youth living in the school dormitory if they would otherwise be homeless; and
- youth who are migrants and who qualify as experiencing homeless because they are living in circumstances described above.

The documentation for an FAA's evaluation of the living arrangements of a student must demonstrate that he or she meets the definition of this category of independent student. The determination may be based upon a written statement from, or a documented interview with, the student that confirms that they are an unaccompanied homeless youth, or unaccompanied, at risk of homelessness, and self-supporting. Such determination should be made without regard to the reasons that the student is unaccompanied and/or homeless.

Remember the following when you are making a homelessness determination:

- Ask for help with determining eligibility from local school district homeless liaisons, state homeless education
 coordinators, the National Center for Homeless Education (https://nche.ed.gov/higher-education/), or the National
 Association for the Education of Homeless Children and Youth (https://naehcy.org/higher-education/). Search for
 "Making Student Status Determinations for Unaccompanied Homeless Youth" to find worksheets and tools to help
 make your determination.
- Relevant information can come from recognized third parties such as private or publicly funded homeless shelters
 and service providers, financial aid administrators from another college, college access programs such as TRIO and
 GEAR UP, college or high school counselors, other mental health professionals, social workers, mentors, doctors, and
 clergy.
- Use discretion when gathering information and respect the student's privacy. Some information, such as that protected by doctor-patient privilege, is confidential. Also, documents such as police or Child Protective Services reports are not necessary. Don't focus on why the student is homeless or unaccompanied but on whether the evidence shows he or she is an unaccompanied homeless youth.
- Determine eligibility based on the legal definitions provided (see "Homeless youth definitions" below).
- Recall that unaccompanied homeless youth may use the address of your school as their own on the FAFSA form.

For students you determine to be unaccompanied homeless youths or unaccompanied, self-supporting youths at risk of being homeless, select the homeless youth determination option (#4) in the dependency override field in FAA Access to CPS Online or EDE. On the paper FAFSA, fill in the relevant bubble in the "College Use Only" box (see the graphic under the "Dependency Overrides" section in this chapter), include your school code, and sign. To cancel a homeless youth determination, you use the same method as when canceling a dependency override: change the dependency override value to "2—FAA override canceled" in FAA Access or EDE.

Finally, if you do not have conflicting information at your institution, you **must** use documentation from an FAA at another institution that made a documented determination that a student was an unaccompanied homeless youth in the same or prior award year. You should also presume that a student for whom your institution has made a determination of homelessness continues to be independent in each subsequent year at your institution unless the student tells you their circumstances have changed, or you have conflicting information.

At risk of being homeless—when a student's housing may cease to be fixed, regular, and adequate, for example, a student who is being evicted and has been unable to find fixed, regular, and adequate housing

Homeless—lacking fixed, regular, and adequate housing

Self-supporting—when a student pays for his or her own living expenses, including fixed, regular, and adequate housing

Unaccompanied—when a student is not living in the physical custody of a parent or guardian

Housing

Fixed—stationary, permanent, and not subject to change

Regular—used on a predictable, routine, or consistent basis

Adequate—sufficient for meeting both the physical and psychological needs typically met in the home

Timing of Determinations of Independence

The FAFSA Simplification Act provides additional guidance on the timing of determinations of independence for certain student populations (HEA 479D(c)). These include unaccompanied homeless youth or at-risk homeless youth, foster care youth, orphans, wards of the court, and students with unusual circumstances.

Institutions must review all requests for a determination of independence as quickly as practicable, but no later than 60 days after the student enrolls.

Note that the timeframe in the law is intended to encourage FAAs to make determinations as quickly as practicable. It is not intended to inhibit FAAs from making such a determination when a student requests one later in an award year. We encourage you to act on a request for a determination of independence within 60 days of the student making such a request. Further, you may deny such requests if a student does not provide requested documentation within the 60-day timeframe.

Conflicting Information

In addition to reviewing application and data match information from the CPS, a school must have an adequate internal system to identify conflicting information—regardless of the source and regardless of whether the student is selected for verification—that would affect a student's eligibility, such as information from the admissions office as to whether the student has a high school diploma or information from other offices regarding academic progress and enrollment status. The school must resolve all such conflicting information, except when the student dies during the award year or when he or she is no longer enrolled and will not re-enroll; if the student later enrolls, you are again obligated to resolve the conflicting information.

Requirement to identify and resolve discrepant information

34 CFR 668.16(f)

If your school has conflicting information concerning a student's eligibility or you have any reason to believe his or her

application information is incorrect, you must resolve the discrepancies before disbursing FSA funds and, as with verification, before making any PJ adjustment. If you discover discrepancies after disbursing FSA funds, you must still reconcile the conflicting information and take appropriate action under the specific program requirements (depending on the outcome, funds may have to be returned).

Requirement to verify questionable data

34 CFR 668.54(a)(2) "If an institution has reason to believe that an applicant's FAFSA information is inaccurate, it must verify the accuracy of that information."

Subsequent ISIRs

You are generally required to review all subsequent transactions for a student for the entire processing year even if you verified an earlier transaction. An exception to this requirement is if a later transaction comes in after the student is no longer enrolled at your institution. Review the EFC or C flag for changes. Review new comments or NSLDS information that impacts eligibility for aid. Check any updates or corrections or whether the verification tracking group has changed. If the EFC has not changed and there are no changes in the C flag, tracking group, or NSLDS information, no action is generally required. If the EFC does change but it either doesn't affect the amount and type of aid received or the data elements that changed were already verified, no action is required. But if the EFC changes and the pertinent data elements were not verified, then you must investigate. Of course, any time the C flag changes or NSLDS data have been modified, you must resolve any conflicts.

Discrepant tax data

Financial aid administrators do not need to be tax experts, yet there are some issues that even a layperson with basic tax law information can evaluate. Because conflicting data often involve such information, FAAs must have a fundamental understanding of relevant tax issues that can impact the need analysis. You are obligated to know (1) whether a person was required to file a tax return and (2) what the correct filing status for a person should be. The IRS's online Interactive Tax Assistant can help with these and other issues by walking the user through a series of questions. IRS Publication 17 is also a useful resource.

For example, an FAA who notices that a dependent student's parents, who are married and live together, have each filed as head of household (which offers a greater tax deduction than filing as single or married) must ask if that is the right status. Resolution of the conflict could be the parents refiling and submitting a copy of the amended return or a reasonable explanation of why there really is no conflict under IRS rules.

Marital and tax filing status

The ISIR/SAR comment codes 361–368 indicate a possible error when the filing status and marital status do not match. This is not considered to be conflicting information subject to the resolution requirements of 34 CFR 668.16(f), but we do encourage schools to review the application for mistakes when these comments appear. Note that the FAFSA's use of prior-prior year tax data can increase the number of these comment codes. See the 2023-24 SAR Comment Codes and Text Guide for more information.

Resolution of conflicting information

You may not disburse aid until you have resolved conflicting information, which you must do for any student as long as he or she is at your school. *Even if the conflict concerns a previous award year, you must still investigate it.* You have resolved the matter when you have determined which data are correct; this might simply be confirming that an earlier determination was the right one. You must document your findings and include an explanation that justifies your decision.

The <u>verification page on the FSA Assessments site</u> has guidance to help you review your conflicting information

procedures; see Activity 1.

Referral of Fraud Cases

If you suspect that a student, employee, or other individual has misreported information or altered documentation to fraudulently obtain federal funds, you must report your suspicions and provide any evidence to the Office of Inspector General (OIG). See also *Volume 2*.

OIG Address and Phone Numbers

National Hotline

Inspector General's Hotline Office of Inspector General U.S. Department of Education 400 Maryland Avenue, SW Washington, DC 20202-1500

Fax: (202) 245-7047

1-800-MIS-USED (1-800-647-8733) Hours: M, W 9-11 a.m. T, Th 1-3 p.m.

To submit a complaint online at any time, go to https://www2.ed.gov/about/offices/list/oig/hotline.html and click on the appropriate link.

	Regional Offices	Telephone No.
Boston, MA	617-289-0174	
New York, NY	646-428-3861	
Philadelphia, PA	215-656-6900	
Pittsburgh, PA	412-395-4528	
Atlanta, GA	404-974-9430	
Pembroke Pines, FL	954-450-7346	;
Chicago, IL	312-730-1630	
Dallas, TX	214-661-9530)
Ann Arbor, MI	734-330-2059	
Denver, CO	303-844-0058	
Nashville, TN	615-736-2205	
Kansas City, MO	816-268-0500	

Long Beach, CA	562-980-4141
Phoenix, AZ	602-507-6180
San Juan, PR	787-773-2746
Washington, DC	202-245-8467
OIG referrals	

Reporting Fraud Rings (Distance Education)

Institutions should submit fraud ring complaints through the Department's OIG encrypted complaint web portal at the URL address https://oighotlineportal.ed.gov. Because the portal is encrypted, institutions do not need to encrypt submitted documents.

In addition, institutions will submit a Fraud Ring Reporting Spreadsheet through the IG's compliant process. For more information on how to report fraud rings or for a copy of the Fraud Ring Reporting Spreadsheet, please review the <u>August 21</u>, 2020 electronic announcement.

FSA Feedback Center

34 CFR 668.16(g)

Through the <u>FSA Feedback Center</u>, students, parents, and others can submit to the Department the following feedback:

- compliments about a positive experience they have had with the Department, a school, or a federal loan servicer;
- allegations of suspicious activity by a school or person that might have violated federal laws regarding federal student aid; or
- complaints about
 - o applying for and receiving federal loans, grants, and work study;
 - o experiences with federal loan servicers, collection agencies, or the Department; and
 - schools—their administration of the FSA programs, marketing and recruitment practices, or misrepresentations of facts.